

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SANDRA MORRISON - ALLEN,

Plaintiff,

- against -

Civil Action No.:  
10 CV 0667  
(SJF/ARL)

JOHN MATTINGLY, COMMISSIONER OF ACS, DEIDRE REYNOLDS, DIRECTOR OF MERCY FIRST FOSTER CARE, JEANIE CAMBRIA MERCY FIRST FOSTERCARE, STUART ALTMAN LAW GUARDIAN FOR CHILD, ERIN GALVIN, ESQ., RACHELLE SKUOL ESQ. FOR ADMINISTRATION OF CHILDREN SERVICES, ANGELLA CAMPBELL CASEWORKER FOR ACS, DR. DEBRA ERNERSIO-JENSSEN, ANDREA LOMAX CASEWORKER, JOSEPH KASPER, ESQ., IRA ERAS, ESQ., JUDGE LINDA TALLY, SISTERS OF MERCY MERCY FIRST FOSTERCARE BOARDING HOMES, JOHN DOE.

**NOTICE OF  
MOTION**

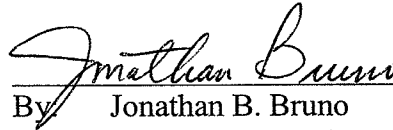
**Filed Electronically**

Defendants.  
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**PLEASE TAKE NOTICE** that upon the attached Affidavit of Jonathan B. Bruno, sworn to on the 20th day of April 2010, the exhibit annexed thereto, and the accompanying Memorandum of Law, Defendant Debra Esernio-Jenssen, M.D., by her attorneys, KAUFMAN BORGEEST & RYAN LLP, will move this Court before the Honorable Sandra J. Feuerstein, United States District Court, Eastern District of New York, 290 Federal Plaza, Central Islip, New York 11722, on a date and time to be determined by the Court, for an Order dismissing Plaintiff's Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: New York, New York  
April 20, 2010

KAUFMAN BORGEEST & RYAN LLP

  
By: \_\_\_\_\_

Jonathan B. Bruno

Allison T. McCabe

Attorney for Defendant

DEBRA ESERNIO-JENSSEN, M.D.

120 Broadway 14th Floor

New York, New York 10271

Telephone No.: (212) 980-9600

KBR File No.: 733.188